

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**KATIE FONDREN CARSON, as Administratrix  
of the Estate of Brian Christopher Ray, AND  
on Behalf of the Wrongful Death Beneficiaries of  
Brian Christopher Ray, AND as Mother and Next Friend  
of B.Z.R., a Minor**

**PLAINTIFFS**

**v.**

**CAUSE NO. 3:23cv3063-HTW-LGI**

**RANKIN COUNTY, MISSISSIPPI, AND  
BRYAN BAILEY, AMANDA THOMPSON,  
JOSHUA BRIDGES, MASON BLACK,  
JOHNATHAN FRANKLIN, TOMMY  
HILDESHEIM, AND PATRICK THORNTON,  
In Their Individual Capacities**

**DEFENDANTS**

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**NOTICE OF ATTORNEY APPEARANCE**

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**NOW COMES** Jason E. Dare of Biggs, Ingram & Solop, PLLC, and first asserting any and all available defenses pursuant to FED. R. CIV. P. 12(b)(1) through 12(b)(7), and further reserving any and all rights of the individual capacity Defendants to qualified immunity, and to object to standing, process, service of process, res judicata, collateral estoppel, prematurity, ripeness, failure to exhaust administrative remedies, laches, unclean hands, and equitable estoppel, as well as any applicable statute of limitations and/or limitations of action on behalf of all Defendants, files this, his Entry of Appearance as counsel on behalf of Rankin County, Mississippi and Sheriff Bryan Bailey, Amanda Thompson, Joshua Bridges, Mason Black, Johnathan Franklin, Tommy Hildesheim, and Patrick Thornton, all in their individual capacities.

**RESPECTFULLY SUBMITTED**, this 12<sup>th</sup> day of February, 2024.

**RANKIN COUNTY, MISSISSIPPI, BRYAN  
BAILEY, AMANDA THOMPSON, JOSHUA  
BRIDGES, MASON BLACK, JOHNATHAN  
FRANKLIN, TOMMY HILDESHEIM, & PATRICK  
THORNTON - DEFENDANTS**

**BY:** /s/ Jason E. Dare  
**JASON E. DARE**

**OF COUNSEL:**

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